USICH Report to Congress:
Community Forum to Discuss GAO Recommendation to Develop a Common Federal Vocabulary on Housing Status

June 2011

To the Congress of the United States

As the Executive Director of the United States Interagency Council on Homelessness (USICH), I am honored to present this report on a meeting requested by Congress to discuss a June 2010 report issued by the Government Accountability Office (GAO) entitled *Homelessness: A Common Vocabulary Could Help Agencies Collaborate and Collect More Consistent Data.*

The GAO Report was delivered to Congress the same month as *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness*. *Opening Doors* is based on the vision that no one should experience homelessness. No one should be without a safe, stable place to call home. This vision was articulated by President Obama when he stated that "it is simply unacceptable for individuals, children, families and our nation's Veterans to be faced with homelessness in this country."

This first ever comprehensive federal plan included a strategy that was similar to the GAO recommendations: "Create a common data standard and uniform performance measures if feasible, especially related to housing stability, across all targeted and mainstream federal programs."

Common information about housing stability would improve identification of people experiencing or at risk of homelessness and provide a more comprehensive understanding of the services used to prevent and end homelessness, as well as service gaps.

On January 26, 2011, USICH hosted a meeting with a broad representation of stakeholders. This day-long meeting allowed us to hear both the benefits people saw in developing a common vocabulary and a common data standard, in addition to some of the challenges associated with moving in this direction. We received concrete suggestions for how we would go forward, as well as cautions of things that need to be considered as we proceed.

In this report, we describe the structure of the January event, summarize the feedback received at that meeting, and reflect on what we think, based on that feedback can be done to continue working towards a common vocabulary and data standard to better inform our work to end homelessness.

Barbara Poppe
Executive Director

Background

Numerous federal agencies administer programs either targeted exclusively to people experiencing homelessness (targeted programs) or available more generally to low-income populations (mainstream programs). Programs sometimes have different eligibility requirements and use different definitions of "homelessness." This can be confusing for people in need of services and service providers, and the differences can make collaboration and data collection difficult. GAO cites the discussion of these different definitions of homelessness as an important part of the discussions leading up to the passage of the Homeless Emergency Assistance and Rapid Transition to Housing Act (HEARTH Act) in 2009.

The HEARTH Act also mandated that the United States Interagency Council on Homelessness (USICH) host a meeting of experts and stakeholders to discuss the feasibility of adopting a common vocabulary and data standard. Creating a common data standard and uniform performance measures related to housing status across targeted and mainstream programs is also a strategy of *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness*.

In this report, "common definition of homelessness" is used distinctly from "common vocabulary around housing status," which in turn is distinct from a "common data standard for collecting information about housing status."

▶ Today, there is not a common definition of homelessness across federal programs. How one program defines homelessness defines who is eligible for housing or services under that program, which differs from how another program defines homelessness and eligibility. This report does not propose to create a common definition of homelessness nor was that included in the GAO recommendations. There is common agreement that adopting a single definition of homelessness could have program and resource implications and in many cases require legislative change.

▶ In this report, USICH does pursue the GAO recommendation that federal agencies develop a common vocabulary, which we interpret to mean specifically around housing status. This would entail developing shared terminology for talking about the many different manifestations of homelessness (e.g., living on the streets or in shelter, doubled-up with family or friends), as well as having a home (e.g., renting, owning a home). Each federal agency would still maintain its own program eligibility criteria as defined by statute, regulation, or administrative rules. A common vocabulary would, however, allow us to better measure the scope and dimensions of homelessness, and it could ease program implementation and coordination on the ground.

▶ A common data standard regarding housing status is a natural outgrowth of a common vocabulary. The data standard refers to the manner in which programs collect and record the housing status of their program beneficiaries. If each agency uses the same set of response categories phrased in the same way (even if not all response categories apply to a given program based on that program's

eligibility criteria), this reduces the data collection and entry burden on grantees. It also allows us a consistent way to measure homelessness across programs—both targeted and mainstream—at the federal level.

Currently, some federal agencies collect data about housing status in their respective targeted homeless programs. They do not, however, currently collect that data in a consistent manner. For illustration purposes only, if the Department of Veterans Affairs is collecting information on who is using its Grant and Per Diem Program in the same way that the Department of Education is collecting information on students experiencing homelessness, in the same way that the Department of Labor is capturing who is served by its Homeless Veterans Reintegration Program, we will have a better national picture of which programs work best for which subsets of people experiencing homelessness, as well as the gaps in services for different subgroups. Again for illustration purposes, below is an example of a data standard on housing status used by HUD for its Homeless Assistance Programs.

Example: HUD Data Standard on Housing Status (March 2010)

Residence Prior to Program Entry
Response Categories
1 = Emergency shelter, including hotel or motel paid for with emergency shelter voucher
2 = Transitional housing for homeless persons (including homeless youth)
3 = Permanent housing for formerly homeless persons (such as SHP, S+C, or SRO Mod Rehab)
4 = Psychiatric hospital or other psychiatric facility
5 = Substance abuse treatment facility or detox center
6 = Hospital (non-psychiatric)
7 = Jail, prison or juvenile detention facility
12 = Staying or living in a family member's room, apartment or house
13 = Staying or living in a friend's room, apartment or house
14 = Hotel or motel paid for without emergency shelter voucher
15 = Foster care home or foster care group home
16 = Place not meant for habitation (e.g., a vehicle, an abandoned building, bus/train/subway station/airport or anywhere outside); inclusive of "non-housing service site (outreach programs only)"
17 = Other
18 = Safe Haven
19 = Rental by client, with VASH housing subsidy
20 = Rental by client, with other (non-VASH) ongoing housing subsidy
21 = Owned by client, with ongoing housing subsidy:
22 = Rental by client, no ongoing housing subsidy
23 = Owned by client, no ongoing housing subsidy
8 = Don't Know
9 = Refused

Most federal mainstream programs do not collect any data on housing status. This limits the federal government's ability to understand the scope and dimensions of homelessness on a national scale, the number of individuals at risk of homelessness, and in helping to assess the effectiveness of federal programs at reaching and serving those that are experiencing homelessness or unstably housed. GAO explained the problems that the lack of a common federal data standard creates in their report:

Although federal agencies collect data on those experiencing homelessness, these data have a number of shortcomings and consequently do not capture the true extent and nature of homelessness. Some of these shortcomings derive from the difficulty of counting a transient population that changes over time, lack of comprehensive data collection requirements, and the time needed for data analysis. As a result of these shortcomings, the data have limited usefulness. Complete and accurate data are essential for understanding and meeting the needs of those who are experiencing homelessness and to prevent homelessness from occurring. (p. 16)

In addition, GAO describes that not having a common data standard on housing status creates obstacles in collaborative federal efforts to prevent and end homelessness, such as data sharing, performance management, and collective goal setting in reducing the number of people experiencing homelessness. In order to collect this valuable data, federal agencies would need to come to consensus on a vocabulary to describe housing status that encompasses existing program definitions and eligibility requirements, and then translate that vocabulary into a common data standard, defined as a uniform set of response categories that programs would collect. USICH convened the Common Vocabulary Forum to discuss the possibility of developing and adopting a common vocabulary and data standard related to housing status for use across targeted and mainstream programs.

The goal of adopting a common vocabulary and data standard regarding housing status is not to change existing laws or program eligibility requirements. Instead the goal is to streamline data collection about housing status across agencies and programs in order to gain a more complete national picture of homelessness and to ease the burden of collecting data on providers.

A common vocabulary and common data standards could be considered far beyond the domain of housing status. For example, programs could adopt common vocabulary and common data standards related to income, employment, health and other measures of well-being. While there might be some benefit to doing this, for the purposes of this report, and the session hosted in January, the proposition to develop a common vocabulary and a common data standard is limited to housing status.

The Design of the Day

On January 26, 2011, USICH hosted the day-long Common Vocabulary Forum at HUD's Brook Mondale Auditorium. Out of the 95 invitees, a diverse group of approximately 85 participants gathered to discuss a common vocabulary and data standard for describing and tracking homelessness and housing status. The diverse group of participants included federal employees, GAO and Congressional staff members, researchers, advocates, local providers, education liaisons, and people who have experienced homelessness.

Mark Johnston, Housing and Urban Development (HUD) Deputy Assistant Secretary for Special Needs, opened the forum with welcoming remarks. USICH Executive Director Barbara Poppe introduced USICH and framed the purpose of the Common Vocabulary forum, which was to discover the value of a common vocabulary and to explore how the participants could develop a common data standard based on the recommendations of the GAO report, *Homelessness: A Common Vocabulary Could Help Agencies Collaborate and Collect More Consistent Data*. A contracted facilitator ran the forum.

The morning's proceedings used a small group process, which fostered productive dialogue and insight from a diverse array of voices. Participants discussed the implications of a common vocabulary—a common continuum of terminology to describe the different manifestations of homelessness, such as sleeping outside, sleeping in a shelter, or living with friends and family. The specific questions asked were:

- ▶ How will a common vocabulary regarding homelessness and housing status help people experiencing homelessness?

- ▶ What might my organization and work gain with a common vocabulary and housing status regarding homelessness? What will it lose?

- ▶ What might be possible with a common data standard regarding homelessness and housing status? What do I fear?

In the afternoon, participants gathered in groups to create a path for developing and implementing a common data standard on homelessness, defined as the way that a common vocabulary is translated into common data collection categories and procedures, so that data can be easily matched across agencies. The following questions served as a guide:

- ▶ What are the steps to take and the questions to answer to develop a common data standard for housing stability and homelessness?

- ▶ What are the steps to take and questions to answer to implement a common housing status data standard across targeted and mainstream programs?

- ▶ What three things do we need to be sure to pay attention to moving forward?

- ▶ What are our three best next steps?

The Forum closed with participants voicing their reflections from the day and checking out by giving a word of advice to USICH in moving forward with a common vocabulary and data standard.

What We Heard

Participants sometimes used the terms "common vocabulary" and "common data standard" interchangeably throughout the course of the day, and at times confused both terms with a "common definition" of homelessness and "common eligibility requirements" and "pooled funding resources." It will be necessary to develop a common conception of what the two terms—"common vocabulary" and "common data standard"—mean as well as realistic expectations for what they can accomplish. Furthermore, implementation of a common vocabulary and data standard could proceed differently depending on the circumstances and needs of individual agencies and providers. However, participants did have clear consensus that a common vocabulary and data standard need to help serve people experiencing homelessness in the most effective and efficient way possible.

Likewise, there were varying assumptions around the difference between having a common vocabulary around homelessness more broadly put, and housing status more specifically. The more broadly people envisioned the scope, the larger the project would need to be. The more narrow, the more focused.

Since the conversations around common vocabulary and common data standards overlapped, we are summarizing the themes that emerged throughout the day into the benefits, challenges, and implementation of a common vocabulary and data standard regarding housing status and homelessness.

Benefits

The benefits of a common vocabulary on homelessness and housing status expressed by participants at the forum included improved counts, better understanding of the scope of homelessness, better tracking of services, and improved service delivery overall and increased collaboration:

▶ Possible gains of using a common vocabulary included having a clearer and precise method for counting people who experience homelessness, which leads to a more accurate understanding of the scope of homelessness and the need for targeted and mainstream services.

▶ Having a common vocabulary would also facilitate tracking of services provided to each consumer by each agency, thus streamlining referrals and service delivery. More accurate population counts and service records should make it easier to target resources to the populations and programs that need them most.

▶ Improved performance management and program evaluation would make program outcomes more comprehensible.

▶ A common vocabulary could facilitate communication between agencies and programs, which may aid in setting collective goals and priorities. Not having to clarify how terms differ between programs should save time and move interagency collaborations forward. Several participants hoped that a common vocabulary would help coordinate services, leading to a "no wrong door" approach to service delivery.

Some participants hoped that a common vocabulary and data standard might remove barriers to accessing services across different agencies. Being able to quickly and clearly state a consumer's needs might make it easier to target and prioritize services according to a person's risk level. A common theme was better matching between resources, services, and consumers. Having a common vocabulary might clarify differences in eligibility requirements across agencies and programs, leading to quicker and better service delivery.

While some assumed that a "common vocabulary" would lead to "common eligibility criteria and pooled funding," or that a common vocabulary would undo the restrictions that prevent agencies from working together, others focused on the specifics of a common vocabulary *per se* and a common data standard.

Concerns

The challenges that the groups voiced about adopting a common vocabulary and data standard were clustered around the theme of resources. One concern associated with a common data standard is that it would be too resource intensive to implement at the state and local level, especially if it were to cover many aspects of homelessness and performance management. Statutory changes might be needed to allow some program funds to pay for related costs. Others feared that current programs would somehow lose resources if there were a common vocabulary that preferred one group of people over another.

There was a collective concern that implementing a common data standard would be burdensome, especially if it were broad in scope. Extra staff might be necessary to collect data. There would be an increased need for training and education. More sophisticated software might be needed. Communities may not implement common data standards consistently, which would make them less useful. Data standards could also interfere with program reporting requirements, and it may be difficult to implement a common data standard within existing privacy laws.

Some expressed concerns that distinct programs would lose their discretion to target particular, often underserved group.

In addition to these broad implementation concerns, the groups had several specific questions about how to make a common vocabulary and data standard as simple, useful, and cost effective as possible. Funding implications of a common data standard was a recurring question among the groups. Specific questions included:

▶ What are the funding needs necessary to implement common data standards?

▶ How would federal agencies be responsible for determining the data standard and collecting the data?

▶ Which programs would fall under a common data standard—would mainstream programs be included as well?

▶ How do you create an inclusive vocabulary that matches the complex reality of homelessness?

▶ What is the minimum amount of data that can be collected to fulfill federal goals?

▶ How will key concepts and terms be defined under a common data standard?

▶ How do you implement a common data standard for unsheltered populations?

▶ What are the expected outcomes of a common data standard?

Ensuring that a common data standard would comply with existing privacy laws and minimize invasive questioning of consumers was also concern. There were security concerns assuming data might to be transferred across agencies. How do we integrate the data as seamlessly as possible to avoid duplicative questioning of consumers and an unreasonable data collection burden on providers? How do we ensure that enhanced data collection improves service delivery?

Implementation

Participants identified next steps for building a common vocabulary and data standard on housing status that encompassed the entire implementation process. There was a desire to create a working group that balanced the need for broad representation with clearly delineated roles including a neutral coordinator. Once a workgroup is assembled, the next step identified would be conducting an inventory of current data standards across agencies to build on common reporting requirements. Then the workgroup would work on classifying existing reporting requirements into a common vocabulary that describes the varying conditions of homelessness that different federal agencies target. Finally, the workgroup would present its findings to agency leaders.

In the development stage, the groups advised that stakeholders would first need to establish a common vocabulary to be able to discuss a data standard, and we were encouraged to look to European and Canadian models for inspiration. It would also be critical to anticipate how data will be used and adjust a data standard accordingly—gaps need to be identified and filled, but it also may be possible to identify data that are not useful and eliminate them. Then data categories need to be refined and stakeholders need to determine a feasible data collection strategy. Once preliminary data standards have been defined, they will need to be piloted. If the data standard accomplishes its goals, then regulations and rules would need to be changed to move toward implementation of the data standard.

The groups also suggested concrete next steps for USICH to pursue moving forward. We were advised to identify leadership and establish a project management plan. Transitional data collection plans would need to be developed while implementation scales up. We would need to consider resources for necessary software, training, additional staff, and technical assistance. We should publish a data standard and data collection protocol and safeguards, while providing guidance on privacy issues. Existing agency reporting requirements would need to be adapted to fit with the new data standard. The federal government would also assist with local implementation and continue to improve the data standard as lessons are learned.

Closing

To close the Forum, participants were invited to discuss their reflections of the day's conversations. Participants noted both the similarity of ideas produced from one table to the next as well as the interdisciplinary makeup of each group. Each participant could look at the potential impact of a common vocabulary and data standard from a different dimension, such as ethical concerns, technical aspects of implementation, and stakeholder concerns. That diversity of expertise needs to continue as the discussion moves forward. The hosts noted that this is just the very beginning of the process, even though a lot of progress was made throughout the course of the day.

At the end, each participant contributed a word of advice to USICH as the discussion of adopting a common vocabulary and data standard moves forward:

▶ Keep the true purpose of finding a common vocabulary and data standard in mind: how it would improve service access and delivery for consumers.

▶ Consider the ethical and privacy implications of a common data standard on consumers.

▶ Make sure that a wide variety of stakeholder voices are included in deciding and implementing a common vocabulary and data standard.

▶ Special emphasis was placed on including consumers at every step of the process.

▶ Make sure that a common vocabulary and data standard will be politically feasible and implementable on the ground without additional burden.

▶ Continue momentum.

▶ Establish a concrete timeline.

▶ Be persistent.

▶ Don't let the perfect be the enemy of the good; progress can be made in steps/stages.

Moving Forward

USICH staff and members of the USICH member agencies found the day productive and beneficial. One thing became clear during the course of the day: we need to start with a framework for thinking about these opportunities to help overcome fairly widespread confusion that the phrases "common vocabulary" and "common data standard," and "homelessness" and "housing status" evoked. There is a significant difference between a "common definition" of homelessness and how that has historically been tied to differences in who is eligible for which programs, a "common vocabulary" for identifying different manifestations of homelessness and housing, i.e, housing status, and a "common data standard" for collecting information across different information systems.

As the GAO report explains, there are different definitions of homelessness used by the Department of Education for the Education of Homeless Children and Youth Program and the extension of educational rights to children and youth experiencing homelessness compared to the definition historically used by HUD to define who was eligible for its targeted Homeless Assistance Programs. As USICH considers the recommendations of the GAO, moving toward a common vocabulary would mean moving away from talking about "ED homeless" and "HUD homeless." Instead, "homeless" could be a broad heading under which would be a descriptive vocabulary of housing status. Different federal programs would likely continue to target different subsets of people experiencing homelessness, but more consistent language would be used to describe and measure the households in these different circumstances.

If federal agencies are able to develop a common vocabulary to describe the many different manifestations of homelessness, then the next step would be to convert that vocabulary to a commonly agreed way to capture those different forms of homelessness in data systems used by both targeted homeless programs and possibly mainstream programs. Since targeted homeless programs use different data systems to store information on who receives housing and services, if the fields are set up in the same way, it would be possible to have better comparisons of who uses which programs.

Agreeing to a common vocabulary that reflects the many nuances of people's experience of homelessness and reflects the diversity of homeless programs is the first step. This is work that is currently being done as the VA and HHS' Projects for Assistance in Transition from Homelessness (PATH) increase the compatibility of their data collection requirements with HUD's evolving data standards for its Homeless Management Information System (HMIS). As agencies work together to come up with a common vocabulary for how they ask about housing status, this lays the groundwork for using a common data standard.

A common data standard means having a common housing status question with standardized response categories that targeted and mainstream programs could adopt, where feasible, as part of their existing reporting requirements. Creating a common housing status data standard would increase the amount of national homelessness data available in the short term without changing program definitions or eligibility criteria.

Even at the point where a common data standard was agreed to, there is still an open question for each targeted homeless program and each mainstream program, whether it is feasible to implement. Testing the viability of a common data standard would likely need to be determined one department, one program at a time.

USICH has a role in encouraging this discussion, and bringing not just the federal agencies to the table, but also engaging the many stakeholder groups—including people who have experienced homelessness—to make sure that federal investments of time and resources drive us toward our vision as efficiently as we can.